

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR, Plaintiff,

v.

CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC;

UPTON & HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23-cv-00374-JL

EMERGENCY MOTION TO STAY THE DEADLINE
FOR THE MOTION TO AMEND THE COMPLAINT WITH AMENDED COMPLAINT UNTIL
THE PENDING ACTIVE MOTIONS THAT ARE NOT STAYED [INCLUDING FOR REMAND,
FOR REMAND DISCOVERY AND FOR APPOINTMENT OF COUNSEL] ARE FULLY
RESOLVED
WITH REQUEST FOR EXPEDITED RULING

1. I hereby move to stay the deadline to file a motion to amend the complaint with the amended complaint, while the below matters are in the process of being resolved. Grounds are as follows.
2. There is a pending motion to remand the case to state court. This motion is an active motion and has not been stayed by the court.
3. There is a pending motion for limited discovery pertaining to the motion to remand to state court. This motion is an active motion and has not been stayed by the court.
4. There is a pending motion to appoint counsel. This motion is an active motion and has not been stayed by the court.
5. These items are antecedent to the motion to amend complaint or the amended complaint being filed and should be resolved first. The court itself stated previously that the remand issues takes precedence and priority over other issues because it is a jurisdictional issue and must be resolved first. The court has not abided by its own dictum. I have a right to know if this case will be remanded or if there will be limited discovery relating to remand, before having to file an amended complaint. The court has had these motions since December 2023. I cannot imagine the reason why they have not been ruled on.
6. I today also filed an objection to the magistrate judge's ruling entered today 3-11-24 pertaining to my motion for reconsideration of my request for reasonable accommodation. I have the right to have the issue with my reasonable accommodation resolved first before being required to meet the current deadline due tomorrow, as it is directly related to it. I am also concerned about how the court will treat my need for accommodation going forward. Also, I would like to preserve my right to appeal this issue immediately should it be necessary given that it affects my ability to prosecute this case.
7. I also have issues with my pacer account which has been disabled (which I have indicated to the clerk office for some time now). I believe I need to file a motion to waive pacer fees with the court but have been unable to do so as yet, given everything else that is going on. Without my pacer account operational, I will be hampered in my ability to prosecute this case.
8. Based on the above, a stay is appropriate. It provides proper clarity or order to the case so that I am not having to do unnecessary tedious work including on amending the complaint or other such motions, if the court does not have jurisdiction over the case, or if discovery is need to properly and fairly dispose of the motion to remand, etc.
9. I ask that the deadline be stayed until these items are fully resolved.
10. I ask that this filing be forwarded to the district court judge Joseph Laplante and I ask that this be ruled upon as soon as possible (if possible by today) given that the deadline is tomorrow. If this motion will instead be ruled upon by the magistrate judge, I ask that it be ruled upon immediately (today if possible) given that the deadline is tomorrow.
11. Please grant a pro se liberal construction to this motion.
12. WHEREFORE, I respectfully request that this Court grants the relief requested or grant any other relief the Court deems proper.

Respectfully submitted,
/s/Andre Bisasor
Plaintiff Andre Bisasor

March 11, 2024

CERTIFICATE OF SERVICE

This filing is served to all parties of record via the e-filing system.

/s/Andre Bisasor
Andre Bisasor